HAND DELIVERED

RECEIVED COMMISSIONER OF POLITICAL PRACTICE

2012 FEB - 1 P 3: 4

Commissioner of Political Practices 1205 8th Avenue P.O. Box 202401 Helena, MT 59620-2401

To Whom It Concerns:

This Complaint is brought by Bowen Greenwood, Executive Director of the Montana Republican Party, P.O. Box 395, Helena, MT 59624. Phone # 406-442-6469.

This Complaint is brought against Beau Wright, a Montana resident.

Statement of Facts

- 1. Beau Wright is presently the treasurer of the Montana Hunters & Anglers Political Action Committee, herein referred to as "MH&A". Wright is also an applicant for the Montana Commissioner of Political Practices, a vacant position herein referred to as "the Commissioner". A copy of Wright's cover letter and resume for this position is attached hereto and incorporated herein as Exhibit "A".
- 2. On February 1, 2010, MH&A filed their initial Form C-6 financial report for the 2010 election cycle with the Commissioner. Covering contributions and expenditures for the period of January 31, 2009 through January 31, 2010, the handwritten document was certified and submitted by the committee's treasurer, Beau Wright of 207 Fluorite Drive, Lewistown, MT 59457. A copy of this Form C-6 financial report is attached hereto and incorporated herein as Exhibit "B".
- 3. In this initial filing, Wright reported that MH&A had received \$7,165 in total receipts, the majority of which was listed as having been contributed by "S.P. Conrad, Retired, PO Box 310, Houlma, LA, 70361" in the amount of \$5,000.
- 5. According to the Louisiana Secretary of State's office, the P.O. Box number Wright listed under S.P. Conrad's name is the mailing address for a corporation based in Houma, LA not Houlma named Gulf Island Fabrication. The corporation, which specializes in the manufacturing of structures in the oil & gas and marine industries, does not list "S.P. Conrad" among their various registered agents and officers. In addition, Gulf Island Fabrication lists "P.O. Box 310, Houma, LA 70361" as having been the corporation's official mailing address since 1989. A copy of Gulf Island Fabrication's corporate filing and the "About Us" section of their website is attached hereto and incorporated herein as Exhibits "C" & "D".
- 6. According to numerous state and federal campaign finance reports, there is no record of an individual under the name "S.P. Conrad" residing in the 70361 zip code as having contributed to a political campaign or committee during the 2010 election cycle. There is, however, a "Conrad S.P Williams, III" who contributed \$500 to Sangisetty for Congress in September 2009. This is likely the same "Conrad Williams" who contributed \$1,000 to Charlie Melancon's campaign in February 2010 and is listed as an attorney with "St. Martin, Williams & Bourque", located in Houma, LA 70361. A copy of campaign contributor data from Houma, LA 70361 during the 2010 election cycle is attached hereto and incorporated herein as Exhibit "E".

- 7. According to St. Martin & Bourque's website, the law firm specializes in maritime law and has brought numerous catastrophic injury suits in oil & gas and environmental litigation. A copy of their website's homepage is attached hereto and incorporated herein as Exhibit "F".
- 8. According to Montana Code Annotated §13-37-229(2), a political committee's Form C-6 financial statement must include, "the full name, mailing address, occupation, and employer, if any, of each person who has made aggregate contributions, other than loans, of \$35 or more to a candidate or political committee."
- 9. MCA 13-37-217 specifies that, "A person may not knowingly receive a contribution or enter or cause the contribution to be entered in the person's accounts or records in another name than that of the person by whom it was actually furnished."
- 10. MCA 13-37-128 specifies that a person who intentionally or negligently violates any of the reporting provisions of Title 13, Chapter 37 is liable for an amount up to \$500 or three times the amount of the unlawful contributions or expenditures, whichever is greater.
- 11. MCA 13-37-208(3) and 13-37-231(2) require the treasurer of a political committee to preserve committee accounts and reports for four years after they were initially filed with the Commissioner.
- 12. MCA 13-37-209 authorizes the Commissioner to inspect accounts kept by the treasurer of a political committee after the election to which the accounts refer.
- 13. The Commissioner's Accounting and Reporting Manual for Political Committees, also known as the "Pink Book", at page 21, reiterates that contributions must be refused when the source is not known or when the person offering money wishes not to be known.

Request for Judgment

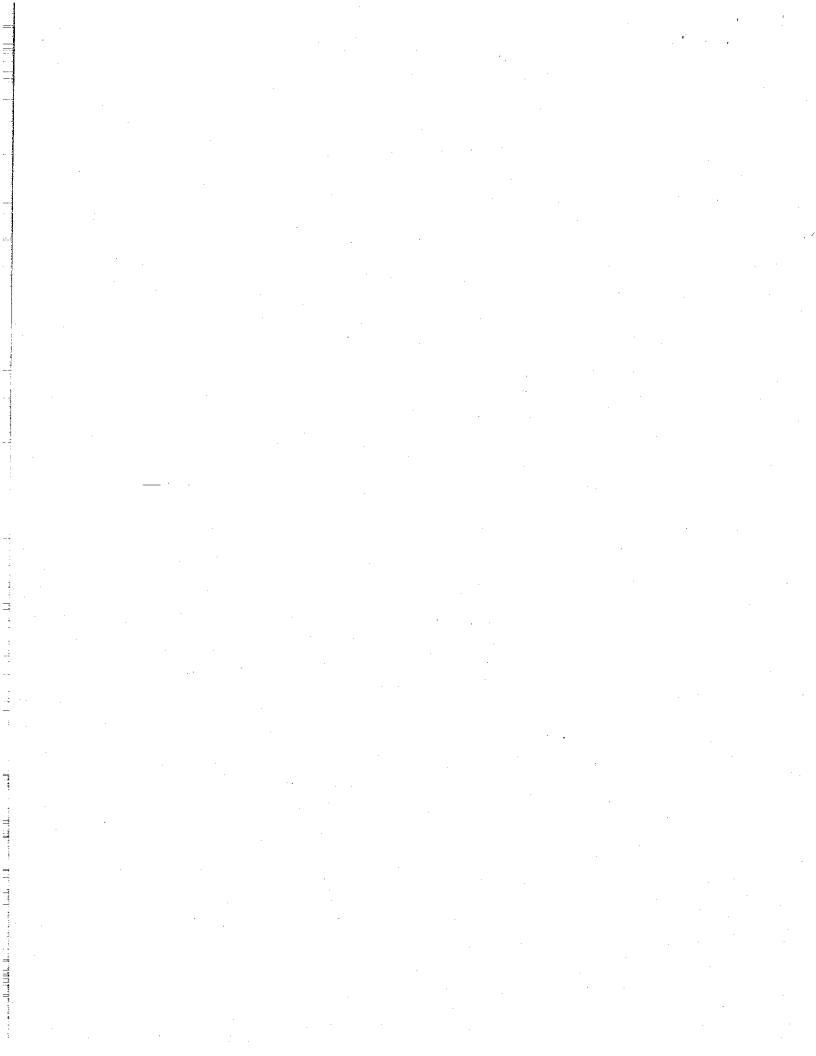
Based on the preceding Summary of Facts and Statement of Findings, there is substantial evidence to conclude that Beau Wright, the individual treasurer for Montana Hunters & Anglers, violated Montana's campaign practices and campaign finance reporting and disclosure laws, and that a civil penalty action under Montana Code Annotated § 13-37-128, is warranted.

02/01/2012

Bowen Greenwood

SEAL RE

ERIN D. HUTH
NOTARY PUBLIC for the
State of Montana
Residing at Helena, Montana
My Commission Expires
September 21, 2015



Schibit A

January 26, 2012

Beau Wright 207 Fluorite Drive Lewistown, MT 59457 406-531-8823 Beauwright@gmail.com

Susan Byroth Fox Legislative Services Division

Dear Ms. Fox,

Please accept the attached resume to be considered for the current vacancy for the Commissioner of Political Practices. I was encouraged to apply by Senate Majority Leader Jim Peterson.

I am currently employed by Lewistown Public Schools where I serve as a government teacher at Fergus High School. As a government teacher I am aware of the challenges and opportunities that campaign transparency and public recording face. The Office of Political Practices has served Montana well in the past, their recent switch to electronic paperless filing is a step in the right direction to be sure that Montanans are fully aware who and where support is coming from in our free and open elections. I would be honored to serve all Montanans to ensure that the Office continues to serve in a professional and efficient way. As a teacher I am required to present material in a non-partisan objective manner. This skill is one that I pride myself in accomplishing. The Commissioner of Political Practices is required to serve with much the same objective standards, something I know I could accomplish.

Montana is the greatest state in the Union. Our political discourse is largely open and cordial. The Office of Political Practices correctly monitors that discourse. In the classroom and in my community I constantly try to promote civic engagement with my students. Believing that leading by example delivers the most powerful lesson, I strive to participate in the political process whenever possible. Hosting school board candidate debates, serving as a ballot counter and being involved in local issues have been examples of this engagement in the past. I see the current vacancy as an opportunity to serve the Treasure State in another capacity and to continue to teach the importance of civic engagement through example.

Please contact me if any further information regarding this application may be required. I appreciate in advance your time and consideration regarding this matter.

Sincerely,

Beau K. Wright

Exhibit A

Beau K. Wright

207 Fluorite Drive beauwright@gmail.com

Lewistown, Montana 59457 406-535-9568

Education

Education Licensure Program
B.S. History (Political Science minor)

Radford University 2002 Radford University 1997

Experience

Teacher, Grade 12 Advanced Placement Government, Economics, Psychology, 2004-present, Fergus High School, Lewistown, Montana

- Successfully developed AP Government curriculum to reflect national standards.
- Responsibilities included advising school student council. Successfully revived homecoming parade and annual Blue Gold Leadership Awards and Breakfast
- Moderator Model UN and Academic Worldquest Team
- Planned and executed switch to paperless classroom implementing digital resources and assessment.
- Voted "Teacher of the Year" by 2010-2011 student body.

Teacher, Grade 9 World History, Grade 12 American Government, Practical Law, 2002-2004, Paul VI Catholic High School, Fairfax, Virginia

- Introduced Southeastern Europe School Connectivity Project, joint project with U.S. State Department and Catholic Relief Services, online community of exchange between students at Paul VI and Serbia.
- Elected to School Council, the expulsion and disciplinary board, 5-member board representing 75 faculty members.
- Moderator of Model United Nations Club

Instructor, Adjudicated Youth Restorative Justice Program, 1998-2000 Aspen Youth Alternative, Boulder, Montana

- Instructed adjudicated youth ages 12-18 in social studies.
- Led intervention curriculum sessions.
- Worked closely with parents, judicial and probation officers to assess student progress.

Faculty Advisor, Government and Leadership Conference, May-November, 1998, Congressional Youth Leadership Council, Washington, DC

- Taught Government to high school honor students from around the country.
- Facilitated small group simulation activities including mock Congress and mock trial scenarios.
- Arranged Congressional visits, tours of Federal Government, and historic sites.
- 2002-2004 leadership intro to public speaking workshop lecturer.

References

Available Upon Request

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THE STATE OF MONTANA

Post Office Box 202401 Helena, MT 59620-2401 FAX NUMBER: 406-444-1643 COMMISSIONER OF POLITICAL PRACTICES 1205 Eighth Avenue WEBSITE: www.politicalpractices.mt.gov TELEPHONE: 406-444-2942

POLITICAL COMMITTEE FINANCE REPORT FORM C-6 (Revised 04/08)

TYPE OR PRINT IN INK ALL INFORMATION ON THIS FORM EXCEPT CERTIFICATION SIGNATURE FULL REGISTERED NAME OF COMMITTEE COMPLETE MAILING ADDRESS (Include City, State, Zip Code) VION toNA ORIGINAL FILING FLUORITE Hunters Awd Lewistowa. AMENDED FILING Avylercs <u>^</u> 25H27 From 1 7 REPORTING PERIOD 13//2064 31/2010 No transactions in period Closing Report Periodic Report Inilial Report

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CERTIFICATION

reasure R , certify the foregoing report of campaign finances with

NOTE: Report MUST BE SIGNED by an officer whose name is on the Statement of Organization form on file in the office of the Commissioner of Political Practices

all attachments is complete and correct to the best of my knowledge, in accordance with Montana 25de Annotated Title 13, phapter 37

FOR OFFICE USE ONLY
Date Received and Postmark Date

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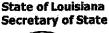
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Tom Schedler Secretary of State





COMMERCIAL DIVISION 225.925.4704

<u>Fax Numbers</u> 225.932.5317 (Admin. Services) 225.932.5314 (Corporations) 225.932.5318 (UCC)

Name

Type

City

Status

GULF ISLAND FABRICATION, INC.

Business Corporation

HOUMA

Active

Previous Names

GIFI, INC. (Changed: 2/28/1990)

Business:

GULF ISLAND FABRICATION, INC.

Charter Number:

34330102 D

Registration Date:

4/27/1989

State Of Origin: Domicile Address

567 THOMPSON ROAD

HOUMA, LA 70363

Mailing Address

P.O. BOX 310

HOUMA, LA 70361

Status

Status:

Active

Annual Report Status:

In Good Standing

File Date:

4/27/1989

Last Report Filed:

5/25/2011

Type:

Business Corporation

Registered Agent(s)

Agent:

KERRY J. CHAUVIN

Address 1:

567 THOMPSON ROAD

City, State, Zip:

HOUMA, LA 70363

Appointment Date: 2/28/1990

Officer(s)

Additional Officers: No

Officer:

KERRY J. CHAUVIN

Title:

Director, President

Address 1:

567 THOMPSON ROAD

City, State, Zip:

HOUMA, LA 70363

Officer:

ALDEN J. LABORDE

Title:

Director

Address 1:

567 THOMPSON RD.

City, State, Zip:

Officer:

HOUMA, LA 70363

ROBIN A. SEIBERT

Title:

Treasurer

Address 1:

567 THOMPSON RD.

City, State, Zip:

HOUMA, LA 70363



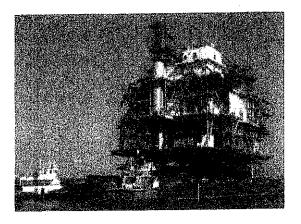


GULF ISLAND, L.L.C.

Gulf Island, LLC is a premier fabricator for domestic and international clients and the Gulf Island subsidiary original of Fabrication, Inc. Since 1985, the company's success has been built on construction, expansion of facilities and capabilities, investment in technology and equipment, and the safety and training of our employees. In fact, Gulf Island's quality control system and safety records are some of the best in the energy industry.

Gulf Island is located on over 600 acres in Houma, Louisiana, in the center of the Gulf of Mexico production region. Our three integrated fabrication yards include over 253 acres of developed fabrication area. Strategically positioned along the Houma Navigation Canal with a 15-foot draft and no overhead restrictions, Gulf Island is approximately 30 miles from the Gulf of Mexico. From here, our service area is limitless.

ISO 9001-2008 Certified



Products and Services

<u>Facilities</u>

Covered Fabrication Shops

Key Equipment

Gulf Island, L.L.C.

A Gulf Island Fabrication, Inc. Company
P.O. Box 310 | Houma, LA 70361
583 Thompson Rd. | Houma, LA 70363
Phone: (985) 872-2110 | Fax: (985) 872-2129







Enter a Zip Code

GO See \$\$\$ Contributors From Your Zip Code

\$1,151,638,947 in Contributions for 2012

Home

Money Search

Top 25 Candidates

About

Data Updated on 9/10/2011

Public Arrest Records 1) Enter Name and State. 2) Access Full Background Checks Instantly. InstantCheckmate.com

Ron Paul in 2012? Would you support Ron Paul for president? Vote in poll. www.newsmax.com

Reverse Citizens United Join the DSCC and Help Overturn Citizens United. Sign up Here! DSCC.org/Stop-Citizens-United

AdChoices D

Contributors: Individual's Name

Employer

Zip Code

State

Name

Party

State

Name Category

Committees (PACs):

'527" Organizations:

Contributors by Zip

Contributors by Name

Organizations

City County

Occupation

Search

HOUMA, LA 70361 **Political Campaign Contributions 2010 Election Cycle**

More

Zip Code Totals

Download Data

Download All Contribution Records From this Zip Code for 2010 To a Spreadsheet or Other File Type

Election Year	Total Money	Money To Democrats	Money To Republicans
2012	\$8,550	\$2,300 (%27)	\$250 (%3)
2010	\$1,148,136	\$53,946 (%5)	\$74,490 (%6)
2008	\$162,198	\$72,083 (%44)	\$49,200 (%30)
2006	\$94,545	\$28,900 (%31)	\$49,780 (%53)
2004	\$115,398	\$55,648 (%48)	\$49,150 (%43)
<u>2002</u>	\$77,050	\$25,250 (%33)	\$14,750 (%19)
<u>2008</u>	\$30,400	\$11,750 (%39)	\$9,200 (%30)

Download Data

Download All Contribution Records From this Zip Code for 2010

To a Spreadsheet or Other File Type

Low Cost Health Insurance www.GoHealthinsurance.com Blue Cross, Aetna, Kaiser, CIGNA & More! Compare Candidates: Plans & View Rates.

3 Bureau Credit Report FreeScoreOnline.com View your latest Credit Scores from All 3 bureaus in 60 seconds for \$0!

State Department Attorney Melville Johnson.com/StateDer Call a State Department Specialist Call us for a Free Consultation

See Todays Mortgage Rates www.MortgageRates.LowertyLobby ists: Mortgages Plunge to 2.5% (3.01%APR) As Seen on Good Morning America!

Client Directories

AdChoices >

Top \$\$\$ Contributors Contributions by Zip Candidates by State Committees (PACs) 527 Organizations

Reports

Celebrity Contributors: Aaron Sorkin Andrew Fastow **Arnold Palmer** Arnold

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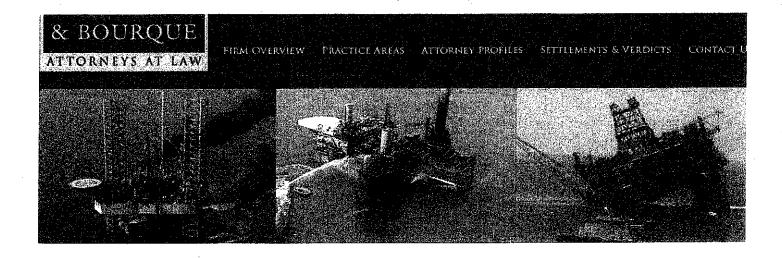
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2010 Election Cycle

Political Campaign	Donor/Contributor List					Bill Cosby
Name	Employer/ Occupation	\$ Amount	Date	Primary/ General	Contibuted To	Bill Gates Calvin Klei
SMITH, WILLIAM C	LYNN PARK SHOPPING CENTER/PARTNER	\$2,400	09/03/2009	G	CHARLIE MELANCON CAMPAIGN COMMITTEE INC - Democrat	Dennis Ko Donald Tru George So
SMITH, WILLIAM C	T. BAKER SMITH, INC./CIVIL ENGINEER	\$2,400	06/24/2009	Р	FRIENDS OF BARBARA BOXER - Democrat	Hugh Hefn Jack Grub Jeff Skillin
SMITH, WILLIAM C	T. BAKER SMITH/CIVIL ENGINEER	\$1,000	02/10/2009	P .	DAN 10 - Democrat	John Grish John Rigas
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<u>Tamplain, Thomas</u> <u>C.</u>	T&D Towing LLC/Owner	\$1,000 03/31/2010 P	SANGISETTY FOR CONGRESS, LLC - Democrat
The Willows	•	\$2,400 10/02/2010 G	HUNT B DOWNER CAMPAIGN - Republican
Thibodaux, Shane	Bow 2 Stern/O wner	\$500 10/04/2010 G	HUNT B DOWNER CAMPAIGN - Republican
Thibodaux, Shane	Bow 2 Stern/Owner	\$500 10/04/2010 G	HUNT B DOWNER CAMPAIGN - Republican
THIBODEAUX, SHANE	ENGINE STARTING PRODUCTS, LLC/OWNER	\$1,000 06/03/2010 P	DAVID VITTER FOR US SENATE - Republican
Thompson, Robert M. Mr. Jr.	The Investment Group/Partner	\$2,400 05/27/2016 P	HUNT B DOWNER CAMPAIGN - Republican
Thompson, Robert M. Mr. Jr.	The Investment Group/Partner	\$2,400 05/27/2010 G	HUNT B DOWNER CAMPAIGN - Republican
<u>Thompson, Robert</u> <u>Mason Mr. Jr</u>		\$-2,400 10/25/2010 G	HUNT B DOWNER CAMPAIGN - Republican
Thompson, Robert Mason Mr. Jr	The Investment Group/Partner	\$2,480 09/16/2010	HUNT B DOWNER CAMPAIGN - Republican DEMOCRATIC STATE
<u>Uhlich, Julienne</u>	Ravi for Congress/campaign manager	\$2,000 04/27/2010 P	CENTRAL COMMITTEE OF LA - Democrat
UHLICH, JULIENNE	RAVIFOR CONGRESS/CAMPAIGN MANAGER	\$2,000 04/27/2010 P	ACTBLUE CHARLIE MELANCON
VOISIN, MICHAEL C	MOTIVATIT SEAFOODS, INC./CEO	\$500 07/28/2009 P	CAMPAIGN COMMITTEE INC - Democrat
Waitz, Joe Mr. Sr.	Waitz & Downer/Attorney	\$2,400 06/29/2010 P	HUNT B DOWNER CAMPAIGN - Republican
Watkins, Kenneth Mr.	Watkins, Walter & Eroche/Attorney	\$1,000 06/29/2010 P	HUNT B DOWNER CAMPAIGN - Republican
WILLIAMS, CONRAD	WILLIAMS LAW GROUP/LAWYER	\$1,000 06/13/2009 P	FRIENDS OF BARBARA BOXER - Democrat CHARLIE MELANCON
WILLIAMS, CONRAD	ST. MARTIN &	•	CAMPAIGN COMMITTEE
<u>s III</u>	WILLIAMS/ATTORNEY	\$400 03/22/2010 P	INC - Democrat CHARLIE MELANCON
WILLIAMS, CONRAD	ST. MARTIN & WILLIAMS/ATTORNEY	\$1,000 02/04/2010 P	CAMPAIGN COMMITTEE INC - Democrat
WILLIAMS, CONRAD S.III	·	\$1,000 09/29/2009 P	CHARLIE MELANCON CAMPAIGN COMMITTEE INC - Democrat
Williams, Conrad S. P. III	Williams Law Group, LLC/Attorney	\$500 09/30/2009 P	SANGISETTY FOR CONGRESS, LLC - Democrat
WILLIAMS, CONRAD S.P. III		\$750 01/12/2009 G	10 SEPH CAO FOR CONGRESS - Republican



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St. Martin & Bourque Law Firm

St. Martin & Bourque is now accepting clients with claims arising out of the explosion, evacuation and subsequent oil spill of the Deepwater Horizon drilling rig. If you or someone you know has a claim, please call us at 1-800-256-1533.

St. Martin & Bourque represents plaintiffs in personal injury, death, commercial litigation and property damage cases. The firm has obtained numerous multi-million dollar settlements and verdicts in catastrophic injury suits in maritime, aviation, oil field, products liability and vehicle collision litigation. Additionally, the firm is involved in representing individuals, corporations and governmental entities in oil and gas related litigation, including property restoration and reclamation.

Charles 'Chuck' Bourque was recently interviewed by MSNBC with regard to the impact of the BP Deepwater Horizon oil spill on the people of Terrebonne Parish and the rest of South Louisiana. Chuck's interview can be viewed online at MSNBC.com.

Charles "Chuck" Bourque recently settled a wrongful death claim on behalf of a person killed in a railroad crossing accident on behalf of his wife and child for \$1.825 million.

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